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February 24, 2021

**VIA ECF**

Honorable Jed S. Rakoff  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Case 1:20-cv-11091-JSR, Zurich American Life Insurance Company v. Nagel**

Dear Judge Rakoff:

In accordance with this Court's Rules and the February 17, 2021 Initial Status Conference in this case, Plaintiff Zurich American Life Insurance Company ("ZALICO") respectfully submits the attached proposed Case Management Order in advance of the continued pretrial conference scheduled for Wednesday March 3, 2021 at 11:15 a.m. We have provided a copy of the proposed Case Management Order to Mr. Nagel via electronic mail but have not received a response from him and do not know his position with respect to the proposed plan.

In addition, following our previous conference, Mr. Nagel requested indemnification from ZALICO. That request has been denied pursuant to ZALICO's by-laws. Mr. Nagel was advised of this decision on February 23, 2021.

Very truly yours,

SEYFARTH SHAW LLP

*/s/ Jeremy A. Cohen*

Jeremy A. Cohen

JAC:rem

cc: Jon Nagel (via email)